March 23, 2022

Via ECF

Honorable LaShann DeArcy Hall United States District Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

Re: United States v. Val Cooper

21-CR-00208-LDH

Honorable Judge Hall:

On behalf of Mr. Val Cooper, I write to respectfully request a modification of Mr. Cooper's bail conditions.

On February 3, 2022, The Honorable Magistrate Judge Robert Levy released Mr. Cooper pursuant to the following conditions: (1) a \$1,000,000 bond; (2) cosigned by five financially responsible persons; (3) travel limited to New York City and Long Island, New York; (4) surrender of travel documents; (5) Pre-Trial Supervision; (6) home detention with electronic GPS location monitoring. Since his release Mr. Cooper has complied with all conditions of his bond and has been in constant contact with counsel and his Pretrial Services officer.

On March 28, 2022, the Court modified Mr. Cooper's conditions of release allowing him to leave his home Monday through Friday from 7:00 am to 5:00 pm. Solely for the purpose of employment with Global Home Care, Inc. On June 22, 2022, the Court modified Mr. Cooper's conditions of release permitting him to leave his home at 7 am through 7 pm, solely for employment purposes.

Mr. Cooper now respectfully moves the Court to modify his conditions of release from home detention with electronic monitoring to a curfew as approved by pretrial services, with electronic monitoring. This request is necessary because Mr. Cooper's employment requires that he travel to several different locations during the course of his employment. The Government and Pretrial services have no objection to this Application.

Wherefore, for the reason stated above, I respectfully request that the Court grant this Application modifying Mr. Cooper's pretrial release conditions to a curfew as approved by pretrial services.

Mr. Cooper and I thank the Court in advance for its attention and consideration of this Application.

Respectfully Submitted,

/s/ Tony Mirvis

By: Tony Mirvis, Esq.

cc: AUSA Devon Lash (Via ECF) PTSO Berzak (Via ECF)